



[ISH] Michaelson v. Buck Kreihs Marine Repair LLC, Adv. Proc. No. 18-01589 re: Request for Authority to Participate Telephonically in Conference

Robert Greenbaum

to:

bernstein.chambers@nysb.uscourts.gov

03/18/2019 12:07 PM

Cc:

Beth Levine

Hide Details

From: Robert Greenbaum <rgreenbaum@skhlaw.com>

To: "bernstein.chambers@nysb.uscourts.gov" <bernstein.chambers@nysb.uscourts.gov>

Cc: Beth Levine <blevine@pszjlaw.com>

1 Attachment



rmg. letter.buck kreihs marine repair.request for telephonic participation.pdf

Chambers of the Honorable Stuart M. Bernstein:

I represent defendant Buck Kreihs Marine Repair LLC in the above-referenced Adversary Proceeding. Per His Honor's Chamber's Rules, see attached for my written request to make a "live" telephonic appearance to participate in the March 19, 2019 at 10:00 a.m. conference re: discovery. Opposing counsel has no objection to my request.

Respectfully,

Robert M. Greenbaum

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## MEMO ENDORSED

*The Court does not hear argument on the telephone. If the defendant plans to contest anything the plaintiff's attorney represents, he must appear.*

*So ordered. 3/18/19*

*Shub  
web*

**SMITH KANE HOLMAN**

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March 18, 2019

**Via E-Mail**

The Honorable Stuart M. Bernstein  
United States Bankruptcy Judge  
Southern District New York  
One Bowling Green  
New York, New York 10004

**Re: Michaelson v. Buck Kreihs Marine Repair, LLC;  
Adv. Pro. No. 18-01589 (SMB)**

Dear Judge Bernstein:

This firm represents the defendant, Buck Kreihs Marine Repair, LLC in the above-referenced adversary proceeding. Per the plaintiff's request, the Court has scheduled a conference regarding the plaintiff's desire for leave to file a motion to compel discovery for Tuesday, March 19, 2019 at 10:00 a.m.

Pursuant to Your Honor's Chamber's Rules regarding telephonic appearances, I am writing to request the Court's permission to make a "live" telephonic appearance in order to speak/participate in the scheduled conference. Given the nature of the appearance, I do not intend to make a substantive argument, but simply inform the Court regarding the status of discovery and respond to any questions that the Court may have.

I am hoping to save the time and expense of travelling to New York City from the Philadelphia area, and believe my telephonic appearance will not adversely impact the conference. Prior to writing this request, I spoke with Beth E. Levine, Esquire, plaintiff's counsel concerning my request; she had no objection to my telephonic participation in the conference.

I am available to answer any questions that the Court may have.

Respectfully submitted,

*/s/ Robert M. Greenbaum*

Robert M. Greenbaum  
for SMITH KANE HOLMAN, LLC

cc: Beth E. Levine, Esquire (via e-mail)